

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

**SUBJECT:** Immediate Removal Request for the United  
Rigging and Hauling PCB Site, Prince  
Georges County, Beltsville, Maryland

**DATE:** 7/1/85

**FROM:** Robert E. Caron, On-Scene Coordinator  
Emergency Response Section (3H72)

**TO:** James M. Seif  
Regional Administrator (3RA00)

**THRU:** Roland Schrecongost, Acting Director  
Hazardous Waste Management Division (3HW00)

I. PURPOSE

The enclosed funding request pertains to the United Rigging and Hauling PCB Site. The response action calls for controlling site access and off-site migration of polychlorinated biphenyl contaminated oil and soil. The second phase of the response will consist of an extent of contamination study followed by removal and disposal of contaminated materials.

II. BACKGROUND

The United Rigging and Hauling PCB Site is an active rigging and hauling operation located in Prince Georges County, Maryland. The company occasionally deals primarily with the acquisition, storage and stockpiling of scrap electrical transformers.

In late March, 1985, the Prince George's County Health Department received an anonymous complaint regarding an oil release into nearby Indian Creek. A sample collected by the County, at an oil filled storm water drainage culvert revealed the presence of PCB at 135 ppm. Upon receiving this result, the county immediately referred this site to the State of Maryland.

On May 1, 1985 the State of Maryland served a legal warrant to gain access and perform onsite sampling. Preliminary analytical data has demonstrated PCB concentrations upwards of 50 to 80 percent in transformers on site. Additionally, significant off-site migration has been detected at levels of up to 2000 parts per million (ppm).

The site which covers approximately 10 acres, is surrounded by a mixed residential/industrial land use. State officials estimated that the local population approximates 5000 inhabitants within one half mile of the site. A recent off-site sample obtained from a storm sewer indicated that PCB contamination is migrating towards a tributary to Indian Creek which is part of the Potomac River Basin. Due to the extent and uncontrolled nature of this site, the State of Maryland requested EPA assistance to mitigate the immediate threat to the public health, welfare and the environment.

The OSC responded on May 8, 1985 at 1900 hours and was briefed by State and County personnel. A site assessment, performed in conjunction with State and County personnel, revealed the following:

- Severely stained soils
- Uncontrolled access
- Heavy industrial/residential area with several residences within 1/4 mile
- Drainage culverts containing oil sheens
- Oily sheen on nearby Indian Creek
- Over 760 transformers, many showing signs of past leakage, several bearing PCB labels.

Preliminary laboratory results provided by the State of Maryland have revealed the presence of PCB in transformers, drainage culverts and soils at the following levels:

- Transformers = as high as 80%
- Drainage Culverts = as high as 2,670 ppm
- Stained soils = as high as 55,000 ppm

The OSC determined, based on the above observations, coupled with a review of the State sample results, that a direct contact threat does exist at this site and there is and was an uncontrolled intermittent serious discharge of PCB, migrating offsite via storm drainage directly into Indian Creek, through the nearby agricultural research station and into the Anacostia River.

At 2045 hours, May 8, 1985 the OSC, after careful review of the facts, and in conjunction with both State and County concurrence elected to utilize the \$50,000 delegated authority to undertake immediate corrective actions. Control and stabilization activities commenced at 2300 hours, May 8, 1985 and involved the following activities:

- Site security (24 hour guard, site perimeter posting)
- Control of offsite migration, involving removal of pooled oil and cleanout of storm drains leading to Indian Creek
- Inventory and inspection of all onsite transformers to address any leaking or badly deteriorated equipment
- Measuring and sampling designed to determine the impact of PCB contamination on both the stream and onsite soils.



The OSC issued verbal "notice" to the property owner and president of United Riggings at 2030 hours on May 8, 1985. The property owner has refused to accept any responsibility for this site, stating that he had no knowledge of the presence of PCBs in transformers which he handled. However, the property owner is presently contemplating the take over of cleanup operations after consultation with his attorneys and generators.

State investigations have indicated that PCB fluids may have been burned on site. There is evidence that the burning of PCB fluids can produce dioxin levels in excess of 1 ppb. In light of this fact, and the unknown extent of contamination, the OSC has implemented a complete measuring and sampling program designed to assess these hazards. The OSC is presently consulting with both ERT and the Centers for Disease Control in order to properly design and implement the sampling program.

### III. THREAT

#### A. HUMAN HEALTH

The Centers for Disease Control (CDC) have determined that the levels of polychlorinated biphenyls (PCB) reported at the site represent a potential health threat. Action should be taken to prevent the possibility of direct contact and further spread of contamination via surface water and air borne particulates. The PCB contamination continues to be tracked off-site by vehicles and visitors to the site. Also, migration of PCB contamination due to heavy seasonal precipitation and blowing dust continues to present a direct contact threat to the public.

PCBs are a group of chemicals which have been demonstrated to cause cancer in animals and are suspect human carcinogens. PCB exposure can result in liver damage, skin pigmentation and chloracne. PCBs can cross the placenta to a fetus and can also concentrate in mother's milk. PCBs have been shown to decrease fertility, yet have increased the amounts of certain enzymes which are found in the liver, lungs and skin. PCBs bioaccumulate, i.e., are retained in human and animal tissues at concentrations in excess of exposure levels.

For known animal carcinogens such as PCBs, any exposure increases the risk of cancer. Using an EPA model for estimating the cancer risk to humans from animal carcinogenicity data, ingestion of approximately 400 micrograms of PCBs is equivalent to an excess cancer risk of one in a million.

#### B. ENVIRONMENT

A large quantity of soil remains contaminated onsite. Preliminary analytical data from the State of Maryland demonstrates PCB concentrations in excess of 50 ppm through a depth of over six feet. The spread of contamination will continue as long as the site remains uncontrolled.

An unnamed tributary to Indian Creek receives runoff from the site via an onsite storm sewer. The State of Maryland has indicated that their analyses have revealed PCB concentrations in excess of 2000 ppm within the storm sewer. Indian Creek lies within the Potomac river drainage basin which has been designated as a high value fish habitat for shad spawning. PCBs will bioaccumulate in all fish species which are exposed to elevated levels of PCB contamination.

#### IV. ENFORCEMENT

Refer to attachment: Confidential Enforcement Strategy.

#### V. PROPOSED PROJECT AND COSTS

The OSC has established proper measures to secure and protect public health and the environment through limiting access by security measures and restricting access to the contaminated areas. Measures have been taken to control and prevent offsite migration by installing impoundment structures as contingency measures while abating offsite migration pathways.

A comprehensive measuring and sampling survey is being formulated to assess the overall extent of contamination of the site. Upon completion of the contamination survey evaluations will be made as to the operational procedures of staging, removing, and either transport the PCB contaminated materials to final disposal destination or utilize on site treatment techniques to abate the PCB threat that exists at the site.

##### Established Costs Phase I

Control and stabilize migration pathways and and install site security (provided via delegated authority)	\$ 40,000
TAT	\$ 7,000
EPA	\$ 3,000

##### Estimated Costs Phase II

Measuring and sampling survey; fencing, stage, segregate and characterize, removal/disposal or onsite technology implementation after extent of contamination performed	\$175,000
TAT	\$ 40,000
EPA	<u>\$ 10,000</u>
Total estimated project costs Phases I and II	\$275,000

Estimated Costs Phase III

After initial determinations of the site are characterized, the implementation of removal and disposal aspects versus onsite treatment techniques will be decided upon. The estimated costs for this phase will be determined based upon conventional transportation, landfill and incineration costs. The OSC intends to submit an additional funding request for this work upon completion of Phase I and Phase II. It is the OSC's opinion that there is not sufficient information available as to quantities to be removed and that it is necessary to determine these facts prior to requesting funds for transportation and disposal.

VI. REGIONAL RECOMMENDATION

Because conditions at the United Rigging and Hauling Site meet the NCP Section 300.65 criteria for an Immediate Removal, I recommend your approval of this immediate removal request. The estimated total project costs are \$275,000 of which \$225,000 are for extramural costs. You may indicate your approval or disapproval by signing below.

APPROVE



DATE

5/13/85

DISAPPROVE

DATE



CONFIDENTIAL - ENFORCEMENT STRATEGY  
UNITED RIGGING AND HAULING  
BELTSVILLE, MARYLAND

The CERCLA Enforcement Section is currently investigating potential responsible parties at this site. At this time, it is believed that there may be several potential responsible parties who may have contributed to the PCB contamination.

Enforcement has been working closely with the OSC during the course of this project to identify these parties.

Enforcement is preparing a CERCLA Section 106 Unilateral Order for United Rigging and Hauling. This Order will be ready for issuance as soon as the ten point document is approved.

Enforcement is discussing the issuance of Orders to several other potential responsible parties. These Orders will be issued only with the approval of the State of Maryland, due to ongoing Criminal investigations at the state level.

In the event that United Rigging and Hauling decides to do the cleanup, the Unilateral Order may be revised into a Consent Order.

Failure to cleanup the site by United Rigging and Hauling will result in a 107 Cost Recovery Action with the potential for the collection of treble damages.